

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO**

**STEPHEN TORRES, as Personal Representative
of the Estate of CHRISTOPHER TORRES, deceased,**

Plaintiff,

v.

No. CIV 12-1048 RB/KBM

**CITY OF ALBUQUERQUE, ex rel.
ALBUQUERQUE POLICE DEPARTMENT;
CHRISTOPHER BROWN; and
RICHARD HILGER,**

Defendants.

PLAINTIFF'S EXPERT WITNESS LIST

Plaintiff Stephen Torres, as Personal Representative of the Estate of Christopher Torres, deceased, by and through his counsel of record, McGinn, Carpenter, Montoya and Love, PA, and pursuant to the Court's Stipulated Order Resetting Certain Pretrial Deadlines [document 55], hereby identifies the following list of expert witnesses who may be called to testify at the trial of this matter by live testimony or deposition.

As discovery is not yet complete and additional witnesses may be identified, Plaintiff reserves the right to amend, supplement or modify this list.

A. George L. Kirkham, D. Crim.
George Kirkham and Associates, Inc.
12444 Aviles Circle
Palm Beach Gardens, FL 33418

As an expert witness, Dr. Kirkham should only be contacted through counsel.

It is anticipated that Dr. Kirkham, an expert in the field of criminology, will testify about police policies and procedures related to training, the use of force, crisis intervention, and interactions with those with mental illness, among other things. He will offer expert opinions about how APD's widespread practices caused the constitutional deprivation that resulted in Christopher Torres's death, as well as about how Officers Brown and Hilger's violation of well-known police

policies and procedures deprived Christopher of his constitutional rights and caused his death and other matters consistent with his deposition testimony.

B. M. Brian McDonald, Ph.D.

4219 Coe Drive N.E.

Albuquerque, New Mexico 87110

As an expert witness, Dr. McDonald should only be contacted through counsel.

It is anticipated that Dr. McDonald will testify as an expert witness on Plaintiff's behalf regarding the subjects of lost household services and lost value of life damages that resulted from Christopher Tones' wrongful death and other matters consistent with his deposition testimony.

C. Ronald R. Scott, M.A., M.S.

Ronald R. Scott Forensic Consulting

37881 N. 10th Street

Phoenix, Arizona 85086

As an expert witness, Mr. Scott should only be contacted through counsel.

It is anticipated that Mr. Scott, an expert in firearms, ballistics and reconstruction will testify as an expert witness on Plaintiff's behalf on the subject of reconstruction of the shooting of Christopher Torres.

D. George Schiro, MS, F-ABC

Consulting Forensic Scientist

Forensic Science Resources

P.O. Box 188

Cade, LA 70519 USA

As an expert witness, Mr. Schiro should only be contacted through counsel.

It is anticipated that Mr. Schiro, a Criminalist and Forensic Scientist, will testify as an expert witness on Plaintiff's behalf on the subject of forensic DNA analysis and biologic materials.

Discovery in this matter is not yet complete, and Plaintiff has not completed his investigation. Therefore, Plaintiff reserves the right to amend or modify this list as appropriate

before trial. Plaintiff also reserves the right to call any witnesses necessary for rebuttal, authentication, or named or disclosed by Defendants.

Respectfully submitted,



McGINN
CARPENTER
MONTOKA
& LOVE

/s/ Tyler J. Atkins

Tyler J. Atkins

Randi McGinn

Kathleen J. Love

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I hereby certify that on this
2nd day of October, 2013, the
foregoing was served electronically
via CM/ECF to all counsel of record.

/s/ Tyler J. Atkins

Tyler J. Atkins